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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

TOMMIE JO BROWN,	)	Case No. 1:22-cv-01323-EPG
	)	
Plaintiff,	)	STIPULATION AND ORDER FOR
	)	EXTENSION OF TIME
vs.	)	(ECF No. 13)
	)	
KILOLO KIJAKAZI, Acting	)	
Commissioner of Social Security,	)	
	)	
Defendant.	)	
	)	
	)	
	)	

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from April 5, 2023 to June 5, 2023, for Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time. Good cause exists for the requested extension. For the weeks of March 27, 2023 and April 3, 2023, Counsel currently has 31 merit briefs, and several letter briefs and reply briefs. This includes cases that undersigned

counsel took on during co-counsel's, Dolly M. Trompeter, leave of absence. Additional time is needed to thoroughly brief this matter for the Court.

Counsel for Plaintiff is currently taking partial leave as his child was born on October 14, 2022. Thus, Counsel is working limited hours.

Additionally, Counsel underwent major surgery on March 15, 2023, requiring post-op physical therapy, with the need for several breaks throughout the workday.

Defendant does not oppose the requested extension. Counsel apologizes to the Defendant and Court for any inconvenience this may cause.

Respectfully submitted,

Dated: April 2, 2023

PENA & BROMBERG, ATTORNEYS AT LAW

By: /s/ Jonathan Omar Pena  
JONATHAN OMAR PENA  
Attorneys for Plaintiff

Dated: April 2, 2023

PHILLIP A. TALBERT  
United States Attorney  
MATHEW W. PILE  
Associate General Counsel  
Office of Program Litigation  
Social Security Administration

By: \*/s/ Geralyn Gulseth  
Geraldyn Gulseth  
Special Assistant United States Attorney  
Attorneys for Defendant  
(\*As authorized by email on March 31, 2023)

**ORDER**

Based on the above stipulation (ECF No. 13), IT IS ORDERED that Plaintiff shall file Plaintiff's motion for summary judgment by no later than June 5, 2023. All other deadlines in the Court's scheduling order are extended accordingly.

IT IS SO ORDERED.

Dated: **April 3, 2023**

/s/ Eric P. Grogan  
UNITED STATES MAGISTRATE JUDGE